

August 25, 2023

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Initial Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E017/M-20-181

Dear Mr. Seuffert:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Otter Tail Power Company's Electric Vehicle Direct Current Fast Charging (DCFC) General Service – Time of Day Pilot Rates

Dear Mr. Seuffert:

Attached are the Comments of the Minnesota Commerce Department, Division of Energy Resources (Department) in the Matter of the Petition of Otter Tail Power Company (Otter Tail) for Approval of Its request for modification of its Electric Vehicle Direct Fast Charging General Service – Time of Day Pilot Rate, Rate Schedule 10.07. The Department responds to the Commission's June 2, 2023 Notice of Comment Period requesting comment on whether the Commission should approve Otter Tail's proposed modifications to the Time-of-Day Pilot rates for its Electric Vehicle Direct Fast Charging General Service.

The Department requests that Otter Tail provide more analysis and support for its proposed increases in electric vehicle (EV) direct current fast charging (DCFC) rates and changes to the time-of-day (TOD) time periods in its reply comments. The Department will make a recommendation after its review of Otter Tail's reply comments.

Sincerely,

/s/ANDY BAHN
Rates Analyst Coordinator

AB/ad
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E017/M-20-181

I. BACKGROUND

On January 31, 2020, Otter Tail Power Company (Otter Tail or the Company) filed a proposal for an EV charging pilot program for DCFC service (the EV pilot).

The Commission approved Otter Tail Power's EV Pilot in its October 27, 2020, *ORDER APPROVING PILOT PROGRAM, GRANTING DEFERRED ACCOUNTING, AND SETTING ADDITIONAL REQUIREMENTS*. In this Order, the Commission approved Otter Tail's Electric Vehicle Direct Current Fast Charging Service – Time of Day Pilot Rate Schedules for company and third-party owned DCFC charging stations.

On May 26, 2023, Otter Tail filed a request with the Commission to modify the EV Pilot rate schedules. Specifically, Otter Tail requested the Commission to approve the following proposals related to its EV DCFC, Section 10.07 rate schedule:

1. updated customer and facility charges for the third-party provider rate,
2. updated energy/demand \$/kWh rate for both third-party provider and company provider rates,
3. change the company provider customer connection fee to a \$/kWh fee,
4. remove rider costs from the customer's charging bill for both third-party provider and company provider rates, combine the connection fee and energy/demand \$/kWh charges together along with any necessary taxes when displaying pricing to customers for the company provider rate, and
5. other miscellaneous administrative tariff changes.¹

II. OTTER TAIL REQUEST FOR MODIFICATION.

In its May 26, 2023 proposal, Otter Tail requested the Commission make tariff changes to improve charging access and customer charging experiences. According to Otter Tail, it made its request to improve the EV drivers' charging experience by removing riders from recovery through the rate schedule and combining all \$/kWh rates on the rate schedule and necessary taxes into one rate displayed to customers through mobile phone applications (apps) or other digital displays. Otter Tail

¹ Docket No. E017/M-20-181, *In the Matter of Otter Tail Power Company's Electric Vehicle Direct Current Fast Charging (DCFC) General Service – Time of Day Pilot Rates*, Otter Tail's Request for Modification of Its Electric Vehicle Direct Current Fast Charging General Service – Time of Day Pilot Rate, Rate Schedule 10.07, p. 10.

proposed to accomplish this objective through modifications to its EV DCFC General Service – TOD Pilot, Rate Schedule 10.07.²

As described by Otter Tail, its current rate schedules are complex and include several electric billing rates and riders, including the following:

- Connection Fee,
- Seasonal and time differentiated energy rates,
- Conservation Improvement Program,
- Transmission Cost Recovery,
- Energy-Intensive Trade-Exposed,
- Energy Adjustment Rider,
- Renewable Resource Adjustment,
- Environmental Rider,
- Uplift program,
- Electric Utility Infrastructure Costs “EUIC”, and
- Taxes (City, State, and Franchise Fee).³

Otter Tail stated the current EV Pilot rate schedule has led to poor customer experiences and has limited the success of the test site from being fully operable, due to complex rates that have left the credit card payment option unavailable. According to Otter Tail, the existing complex rates, with many itemized lines of billing charges, combined with the challenges of trying to display itemized receipts on the mobile app to customers, limit what the developer can program. Therefore, Otter Tail proposed to modify the company provider rate by combining the energy/demand, renewable energy credit, and cost of fuel rider charges into one rate. In addition, Otter Tail proposed changing the connection fee to a \$/kWh fee for an easier to understand all-in-one price for customers.⁴ Finally, Otter Tail increased the rate components for the company provider rates to reflect marginal costs as determined through a new marginal cost study.⁵ Otter Tail’s proposed changes to the company provider rate are given in Table 1 below.

² *Id.*, p. 1.

³ *Id.*, p. 3.

⁴ *Id.*, pp. 5-6.

⁵ *Id.*, pp. 5, 8.

Table 1: Secondary Service – Company Provider W-REC’s (M448) ⁶

EV Connection Fees	Current (per connection)	Proposed (\$/kWh)	Proposed Increase
DC Level 2 Chargers	\$3.00	\$0.11586	NA
DCFC 100 kW or Less	\$6.00	\$0.17551	NA
DCFC More than 100 kW	\$8.00	\$0.17724	NA
Energy/Demand Charge per kWh (Summer)			
On-Peak	\$0.13383	\$0.19539	\$0.06156
Mid-Peak	\$0.04899	\$0.06252	\$0.01353
Off-Peak	\$0.00087	\$0.03127	\$0.03040
Energy/Demand Charge per kWh (Winter)			
On-Peak	\$0.07098	\$0.15169	\$0.08071
Mid-Peak	\$0.02435	\$0.08112	\$0.05677
Off-Peak	\$0.00591	\$0.05496	\$0.04905

Otter Tail requested the \$/kWh Connection Fee and proposed \$/kWh Energy/Demand charges be bundled together for one billing determinant when displaying \$/kWh prices to customers through EV charging mobile phone apps or other displays. Otter Tail believes changing the connection fee to a \$/kWh charge and the ability to bundle all energy/demand, fuel cost, renewable energy credits, taxes, networking/bill processing fees, and applicable franchise fees into one flat \$/kWh rate will improve customer experience by making it more similar to what gasoline powered customers experience at the gas pump.⁷

Otter Tail also stated a flat dollar connection fee creates problems if the customer experiences any issues with the connection between the charger and their vehicle. In such cases, the customer will be billed with a connection fee even if they received very little energy. The customer must then restart or reconnect the charging session and is billed an additional connection fee. Otter Tail stated these errors can occur from a variety of issues, such as vehicle communication interruptions to charger or the plug connection that is not properly attached for charging. Otter Tail explained further that, for safety reasons, charging equipment is sensitive to any fault in communication and will default to stopping the charging session. In 2022, disconnections occurred an average of 2.23% of the connection attempts and 37.50% of attempts in January 2022. Otter Tail explained the proposed \$/kWh connection fee rates shown in Table 1 above reflect the expected cost of equipment deployed and the customer charging frequency divided by the average kWh being consumed by customers at the different sizes of chargers.⁸

⁶ *Id.*, Attachment 1, Redline Version of MN Rate Schedule 10.07 – Electric Vehicle Direct Current Fast Charging (DCFC) General Service – Time of Day Pilot, p 2 of 6.

⁷ *Id.*, p. 7.

⁸ *Id.*, pp. 6-7

In addition, Otter proposed removing rider costs from EV DCFC charging rates. Otter Tail explained the current amount of rider revenue from energy sales creates significant burden by collecting the mandatory riders revenue monthly from the billing network provider, and then allocating the rider revenue to each internal rider tracker. Therefore, Otter Tail plans to not collect the riders until they become of material significance. Otter Tail estimated these uncollected rider revenue amounts to be less than \$6,000 on an annual basis. The Company proposed to report the estimated non-collected rider amounts in its annual compliance filing in Docket No. E017/M-20-181, so it may decide later when it is appropriate to include them in the bill to the EV charging customer.⁹

In addition, Otter Tail proposed to modify rates for third-party provider DCFC's using the same marginal costs as the company provider proposed rates. Table 2 below represent tariff rates for third-party charging providers connecting to Otter Tail's secondary distribution system and Table 3 below represents tariff rates for third party charging providers connecting to Otter Tail's primary distribution system.

Table 2: Secondary Service – Third-Party Provider W-REC's (M430)¹⁰

	Current rate	Proposed rate	Proposed Increase
Customer Charge (Per Month)	\$50	\$102	\$52
Facility Charge (per Month per annual Max. kW)			
Less than 500 kW	\$0.78	\$0.82	NA
500 kW to 1000 kW		\$0.68	NA
Energy/Demand Charge per kWh (Summer)			
On-Peak	\$0.13383	\$0.17763	\$0.04380
Mid-Peak	\$0.04489	\$0.05684	\$0.01195
Off-Peak	\$0.00087	\$0.02843	\$0.02756
Energy/Demand Charge per kWh (Winter)			
On-Peak	\$0.07098	\$0.13790	\$0.06692
Mid-Peak	\$0.02435	\$0.07375	\$0.04940
Off-Peak	\$0.00591	\$0.04996	\$0.04405

⁹ *Id.*, pp. 7-8.

¹⁰ *Id.*, Attachment 1, p. 1 of 6.

Table 3: Primary Service – Third-Party Provider W-REC’s (M431)¹¹

	Current	Proposed	Proposed Increase
Customer Charge (Per Month)	\$110	\$273	\$163
Facility Charge (per Month per annual Max. kW)			
Less than 1000 kW	\$0.25	\$0.47	\$0.22
Energy/Demand Charge per kWh (Summer)			
On-Peak	\$0.12846	\$0.17149	\$0.04303
Mid-Peak	\$0.04217	\$0.05536	\$0.01319
Off-Peak	\$0.00082	\$0.02784	\$0.02702
Energy/Demand Charge per kWh (Winter)			
On-Peak	\$0.06855	\$0.13288	\$0.06433
Mid-Peak	\$0.02297	\$0.07139	\$0.04842
Off-Peak	\$0.00505	\$0.04856	\$0.04351

Similar to company-provider charging rates, Otter Tail stated it will remove riders from the third-party provider rate schedules and make a request to the Commission to add the rider costs to company-provider and third-party provider DFC rates, when rider revenues become material, “likely in several years.”¹²

III. DEPARTMENT ANALYSIS

In its analysis below the Department addresses each topic listed in the Commission’s June 2, 2023 Notice of Comment Period.

A. SHOULD THE COMMISSION APPROVE THE UPDATED CUSTOMER AND FACILITY CHARGES FOR THE THIRD-PARTY PROVIDER RATES?

The current and proposed customer and facility charges for third-party provider rate are shown in Table 4 below.

¹¹ *Id.*, Attachment 1, p. 2 of 6.

¹² *Id.*, p. 6.

Table 4: Third Party Provider Customer and Facility ¹³

	Current rate	Proposed rate	Increase	(%) Increase
Customer Charge (Per Month)				
Secondary	\$50	\$102	\$52	104.00%
Primary	\$110	\$273	\$163	148.18%
Facility Charge (/Mo./Ann. Max kW)				
Secondary Less than 500 kW	\$0.78	\$0.82	NA	NA
Secondary 500 kW to 1000 kW	NA	\$0.68	NA	NA
Primary Less than 1000 kW	\$0.25	\$0.47	\$0.22	88.00%

The Department notes that Otter Tail only indicated third-party provider charging rates, including the customer and facility charges, were updated to reflect marginal costs from a new marginal cost study. Otter Tail did not attach the new marginal cost study to its filing, nor did it provide the calculations it used to determine the proposed customer and facility charges.

The Department also notes the significant increase in OTP’s proposed third-party customer and facility charges reflected in Table 4. OTP proposes to increase its monthly customer charges by 148% for primary connections and 104% for secondary connections. In addition, OTP proposes an 88% increase in facility charges for primary connections using less than 1000 kW.

The Department requests that Otter Tail provide in its reply comments, a breakdown of the component costs contained in the customer and facility charges and provide the calculations, in spreadsheet format, it used to determine the *current* customer and facility charges based on the previous marginal cost study and the calculations it used to determine its *proposed* customer and facility charges based on the new marginal cost study. In its reply comments, Otter Tail should also indicate the relevant portions in the new marginal cost study that changed to support the updated rates. In addition, the Department recommends that Otter Tail narratively explain in reply comments the reasons for the significant increase in its proposed customer and facility charges reflected in Table 4. Finally, the Department requests that Otter Tail attach to its reply comments both the new and old marginal cost study and any other supportive material it used for calculating the updated customer and facility charges.

B. SHOULD THE COMMISSION APPROVE THE UPDATED ENERGY/DEMAND \$/KWH RATES FOR BOTH THIRD-PARTY PROVIDER AND COMPANY-PROVIDER RATES?

The \$/kWh energy/demand rates for both Company and Third for third-party providers rates are shown in Table 5 below.

¹³ *Id.*, Attachment 1, pp. 1-2 of 6.

Table 5: Energy/Demand Charge per kWh for third-Party and Company

	Current rate	Proposed rate	Increase	(%) Increase
Energy/Demand Charge per kWh (Summer)				
3rd-party Secondary On-Peak	\$0.13383	\$0.17763	\$0.04380	32.73%
3rd-party Secondary Mid-Peak	\$0.04489	\$0.05684	\$0.01195	26.62%
3rd-party Secondary Off-Peak	\$0.00087	\$0.02843	\$0.02756	3167.82%
3rd-party Primary On-Peak	\$0.12846	\$0.17149	\$0.04303	33.50%
3rd-Party Primary Mid-Peak	\$0.04217	\$0.05536	\$0.01319	31.28%
3rd-Party Primary Off-Peak	\$0.00082	\$0.02784	\$0.02702	3295.12%
Company On-Peak	\$0.13383	\$0.19539	\$0.06156	46.00%
Company Mid-Peak	\$0.04899	\$0.06252	\$0.01353	27.62%
Customer Off-Peak	\$0.00087	\$0.03127	\$0.03040	3494.25%
Energy/Demand Charge per kWh (Winter)				
3rd-party Secondary On-Peak	\$0.07098	\$0.13790	\$0.06692	94.28%
3rd-party Secondary Mid-Peak	\$0.02435	\$0.07375	\$0.04940	202.87%
3rd-party Secondary Off-Peak	\$0.00591	\$0.04996	\$0.04405	745.35%
3rd-Party Primary On-Peak	\$0.06855	\$0.13288	\$0.06433	93.84%
3rd-Party Primary Mid-Peak	\$0.02297	\$0.07139	\$0.04842	210.80%
3rd-Party Primary Off-Peak	\$0.00505	\$0.04856	\$0.04351	861.58%
Customer On-Peak	\$0.07098	\$0.15169	\$0.08071	113.71%
Customer Mid-Peak	\$0.02435	\$0.08112	\$0.05677	233.14%
Customer Off-Peak	\$0.00591	\$0.05496	\$0.04905	829.95%

The Department notes and has concerns for the non-uniform percentage increases in energy/demand \$/kWh rates for TOD time periods. In particular, the Department notes the very large increase in off-peak summer energy/demand rates and for the larger increases for on-peak, mid-peak and off-peak winter rates. For example, as shown in Table 5, OTP’s proposed Company off-peak energy/demand rates for Summer is proposed to go from \$0.00087 to \$0.03040 which amounts to a 3,494% increase. Similar to the customer and facility charges, the Department notes that Otter Tail only indicated the energy/demand \$/kWh charging rates were updated to reflect marginal costs from a new marginal cost study. The Department requests Otter Tail provide an explanation for these non-uniform percentage rate increases. The Department requests further that Otter Tail provide in its reply comments, a breakdown of the component costs within the energy/demand rates and the calculations it had used to determine the *current* energy/demand charges for both the company and third-party rate schedules based on the previous marginal cost study and the calculations it used to determine its *proposed* energy/demand charges based on the new marginal cost study. In addition, the Department recommends that Otter Tail narratively explain in reply comments the reasons for the significant increase in its proposed customer energy/demand charges reflected in Table 5. In its reply comments, Otter Tail should also indicate the relevant portions in the new marginal cost study that changed to

support the updated rates. Otter Tail should attach all supportive material it used for its calculations to its reply comments.

C. SHOULD THE COMMISSION APPROVE THE CHANGE TO THE COMPANY PROVIDER CUSTOMER CONNECTION FEE TO A \$/KWH FEE?

The current and proposed EV connection fees are shown in Table 6 below.

Table 6: Secondary Service – Company Provider W-REC’s (M448)					
EV Connection Fees	Current (per connection)	Proposed (\$/kWh)	Increase	(%) Increase	
DC Level 2 Chargers	\$3.00	\$0.11586	NA	NA	
DCFC 100 kW or Less	\$6.00	\$0.17551	NA	NA	
DCFC More than 100 kW	\$8.00	\$0.17724	NA	NA	

To improve charging access and customer charging experiences, the Department supports changing the company provider connection fee to a \$/kWh rate. However, the proposed \$/kWh rates were also not supported by analysis of costs in Otter Tail’s request for modification. The Department requests that Otter Tail provide in its reply comments, a breakdown of the component costs contained in the connection fee rates and provide the calculations, in spreadsheet format, it had used to determine the current per connection fee based on a cost study and the calculations it used to determine its proposed \$/kWh connection rates based on the cost study. Finally, the Department requests that Otter Tail attach all supportive material it used for calculating the \$/kWh rate connection fee.

D. SHOULD THE COMMISSION APPROVE OTTER TAIL’S PROPOSAL TO REMOVE RIDER COSTS FROM THE CUSTOMER’S CHARGING BILL FOR BOTH THIRD-PARTY PROVIDER AND COMPANY-PROVIDER RATES?

To improve charging access and customer charging experiences and reduce the complexity of charging rates, the Department is not opposed to removing rider costs from the customer’s charging bill for both third-party provider and Company-provider rates, given the relatively small estimate for uncollected rider revenue amounts of less than \$6,000. However, the Department requests Otter Tail provide a breakdown of the estimate for the \$6,000 in rider costs and how it was calculated. In its breakdown, Otter Tail should list riders impacted and the forecast amounts uncollected for each rider.

E. SHOULD THE COMMISSION APPROVE THE PROPOSAL TO COMBINE THE CONNECTION FEE AND ENERGY/DEMAND \$/KWH CHARGES TOGETHER ALONG WITH ANY NECESSARY TAXES WHEN DISPLAYING PRICING TO CUSTOMERS FOR THE COMPANY PROVIDER RATE?

To improve charging access and customer charging experiences and reduce the complexity of charging rates, the Department supports combining the connection fee and the Energy/Demand \$/kWh rates together along with necessary taxes when displaying pricing for the company provider rate.

F. SHOULD THE COMMISSION APPROVE OTHER MISCELLANEOUS ADMINISTRATIVE TARIFF CHANGES AS DESCRIBED IN SECTION IV. D. OF OTTER TAIL POWER’S PETITION?

The Department notes that miscellaneous administrative tariff changes described in Section IV. D. of Otter Tail’s petition include changes to the time periods for the EV TOD pilot rates. The current and proposed time periods for EV TOD pilot rates are shown in Table 7 below.

Table 7: EV TOU Time Periods		
	Current	Proposed
Summer		
On-Peak M-F	1 PM - 6 PM	1 PM - 7 PM
Mid-Peak M-F	12 PM - 1 PM, 6 PM- 8 PM	11 AM - 1 PM, 7 PM - 10 PM
Mid-Peak Weekends	1 PM - 6 PM	11 AM - 10 PM
Off-Peak MF	8 PM - 12 PM	10 PM - 11 AM
Off-Peak Weekends	6 PM - 12 PM	10 PM - 11 AM
Winter		
On-Peak M-F	7 AM - 11 AM	7 AM - 11 AM
Mid-Peak M-F	6 AM - 7 AM, 11 AM - 9 PM	6 AM - 7 AM, 11 AM - 10 PM
Mid-Peak Weekends	7 AM - 11 AM, 5 PM - 9 PM	6 PM - 10 PM
Off-Peak MF	9 PM - 6 AM	10 PM - 6 AM
Off-Peak Weekends	11 AM - 5 PM, 9 PM-6 AM	10 PM - 6 PM

The Department notes Otter Tail did not provide any analysis or justifications for the change in the time periods for EV Pilot TOD rates. The Department requests Otter Tail provide the analysis and justifications for changing the time periods for the EV Pilot TOD rates in its reply comments.

IV. CONCLUSIONS.

To improve charging access and customer charging experiences and reduce the complexity of charging rates, the Department is not opposed to Otter Tail’s initiative to modify the company provider rates by combining the energy, renewable energy credit, cost of fuel rider charges and taxes to be displayed to customers in one \$/kWh rate. However, the Department notes that rate increases need to be justified and supported with cost-of-service information, which was not substantively provided in Otter Tail’s initial filing. The same is true for the adjustment of time periods for the TOD rate proposal. As noted in the comments above, the Department requests that Otter Tail provide more analysis and support for its proposed increases in the EV Pilot rates and changes to the TOD time periods, together with attached supplemental information, in its reply comments. The Department will make a recommendation to the Commission after its review of Otter Tail’s reply comments.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. E017/M-20-181

Dated this **25th** day of **August 2023**

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Thomas	Ashley	tom@greenlots.com	Greenlots	N/A	Electronic Service	No	OFF_SL_20-181_Official Service List 20-181
Anjali	Bains	bains@fresh-energy.org	Fresh Energy	408 Saint Peter Ste 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_20-181_Official Service List 20-181
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_20-181_Official Service List 20-181
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-181_Official Service List 20-181
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Jason	Grenier	jpgrenier@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-181_Official Service List 20-181
Joe	Halso	joe.halson@sierraclub.org	Sierra Club	1536 Wynkoop St Ste 200 Denver, CO 80202	Electronic Service	No	OFF_SL_20-181_Official Service List 20-181
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_20-181_Official Service List 20-181
Samantha	Houston	shouston@ucsusa.org	Union of Concerned Scientists	1825 K St. NW Ste 800 Washington, DC 20006	Electronic Service	No	OFF_SL_20-181_Official Service List 20-181
Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.	11 East Superior St Ste 125 Duluth, MN 55802	Electronic Service	No	OFF_SL_20-181_Official Service List 20-181

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_20-181_Official Service List 20-181
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-181_Official Service List 20-181
Mark	Nabong	mnabong@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive #1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_20-181_Official Service List 20-181
David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_20-181_Official Service List 20-181
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-181_Official Service List 20-181
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-181_Official Service List 20-181
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-181_Official Service List 20-181
Dean	Taylor	dtaylor@pluginamerica.org	Plug In America	6380 Wilshire Blvd, Suite 1000 Los Angeles, CA 90048	Electronic Service	No	OFF_SL_20-181_Official Service List 20-181
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-181_Official Service List 20-181

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Justin	Wilson	justin.wilson@chargepoint.com	ChargePoint	240 East Hacienda Ave. Campbell, CA 95008	Electronic Service	No	OFF_SL_20-181_Official Service List 20-181